

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK**

CHRISTINA LEWIS, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

YRC WORLDWIDE INC., JAMES L.
WELCH, JAMIE G. PIERSON, STEPHANIE
D. FISHER, and DARREN D. HAWKINS,

Defendants.

Case No. 1:19-cv-00001-GTS-ATB

**NOTICE OF UNOPPOSED MOTION FOR ENTRY OF ORDER PRELIMINARILY
APPROVING SETTLEMENT AND ESTABLISHING NOTICE PROCEDURES**

PLEASE TAKE NOTICE that Lead Plaintiffs Lead Plaintiffs Peter Szabo and the City of Warwick Retirement Fund (“Plaintiffs” or “Lead Plaintiffs”), individually and on behalf of all others similarly situated, will hereby move this Court on a date and at such time as may be designated by the Honorable Glenn T. Suddaby, United States District Judge of the United States District Court for the Norther District of New York, 100 S. Clinton Street, Syracuse, NY 13261, for entry of an Order: (1) preliminarily certifying the Settlement Class for the purposes of settlement; (2) preliminarily approving the terms of the Settlement as set forth in the Stipulation of Settlement (“Stipulation”), filed concurrently herewith; (3) approving the form and method for providing notice of the Settlement; and (4) scheduling a Settlement Approval Hearing and deadlines for mailing and publication of the Notice, the filing of Settlement Class Member objections, the filing of Settlement Class Member opt-out notices, the filing of Plaintiffs’ motion

for Final Approval of the Settlement, and the filing of Lead Counsel's application for attorneys' fees and expenses.

This motion is based on this Notice of Unopposed Motion, the Stipulation and all exhibits attached thereto, Plaintiffs' supporting Memorandum of Law, all filed contemporaneously herewith, and all pleadings, records, and papers on file herein.

Defendants do not oppose the relief requested by this motion. Accordingly, Plaintiffs request that the Court enter the [Proposed] Order Granting Lead Plaintiffs' Motion for Preliminary Approval of Class Action Settlement, a copy of which is attached as Exhibit A to the Stipulation.

Dated: April 15, 2021

Respectfully submitted,

/s/ Jeremy A. Lieberman

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CERTIFICATE OF SERVICE

I hereby certify that on April 15, 2021, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

By: /s/ Jeremy A. Lieberman
Jeremy A. Lieberman